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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARC SHERMAN,

No. 08-CV-00967

Plaintiff,

v.

**JOINT REPORT PURSUANT
TO FRCP 26(f)**

MCI COMMUNICATION SERVICES, INC.,
d/b/a VERIZON BUSINESS SERVICES,

Defendant.

Pursuant to FED. R. CIV. P. 26(f), and the Initial Scheduling Order entered on March 20, 2008, the parties hereby submit the following report concerning electronic evidence.

I. *FRCP 26(f)(3)(C)* - Issues about disclosure or discovery of electronically stored information, including the form or forms in which it should be produced.

The parties propose that all electronically stored information be produced in paper format unless otherwise agreed.

II. *FRCP 26(f)(3)(D)* - Issues about claims of privilege or of protection as trial preparation materials.

The parties do not propose any procedure for the assertion of privilege beyond those contained in the Federal Rules of Civil Procedure.

III. *FRCP 26(f)(3)(F)* – Any other orders that the court should issue under Rule 26(c) or under Rule 16(b) and (c).

The parties agree to make a good faith effort to agree upon a protective order and to submit the agreed upon protective order to the Court for entry on or before May 30, 2008.

Dated: New York, NY
April 3, 2008

/s/ Martin W. Aron
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SO ORDERED:

Dated: April __, 2008
New York, New York

United States District Judge